



**UTAH PROFESSIONAL ARCHAEOLOGICAL COUNCIL**

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VP of Government Affairs and Research  
Utah Professional Archaeological Council  
P.O. Box 573  
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30 June 2018

Bureau of Land Management  
Green River District, Price Field Office  
125 South 600 West  
Price, Utah 84501

Dear Ms. Lohman,

It is the policy of the Utah Professional Archaeological Council (UPAC) to consult on undertakings that possess potential to set archaeological procedural precedents, or that may affect the understanding and management of a large number of archaeological sites, large sites, or unique sites or groups of sites. It is the feeling of UPAC that the “September Oil and Gas Lease Sale” for the Price and Richfield BLM Field Offices (Reference number 8110 [LLUTG02000]R) fits these criteria. I thank the Price Field Office of the BLM for bringing this project to our attention and giving UPAC the opportunity to comment.

By-in-large, UPAC has little to comment on for-or-against the proposed lease sales in Emery and Wayne Counties. The proposed lease sale appears to be straightforward and in a remote area that has had some limited oil and gas development. The report indicates that the BLM has done their due diligence in performing a comprehensive literature review and has taken into consideration relevant comments and ethnographic information. UPAC did express concerns in 2017 regarding the reliability of the predictive model used by the Price FO for the San Rafael Desert Master Leasing Plan that was mentioned in this literature review. Those concerns focused specifically on the reliability of predicting historic and rock art sites due to very few data points.

As discussed in the consultants meeting on June 20<sup>th</sup>, UPAC would like to see more specific information with consultation guidance for the leasing reform policy. As the consultation representative and Vice President of Government Affairs and Research for UPAC, I would, again, like to extend my gratitude for the opportunity to comment on this report. Please contact me if there are any questions.

Sincerely,

Hannah Russell, MA, RPA